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October 19, 2021

VIA ECF

Hon. Sarah L. Cave
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Ramos, *et al.* v. BDJVegan1, Inc., *et al*
Case No.: 16-cv-08776 (SLC)

Your Honor:

Our office represents Plaintiffs in the above-captioned matter. I write to inform the Court on the status of the Parties' submission of the revised Settlement Agreement ("agreement" or "revised agreement") and to request a brief extension of time to submit the agreement.

On October 12, 2021, the Court issued an Order directing the Parties to file a revised agreement specifying, in part, each Plaintiffs total recovery and confirming that the revised agreement was translated for the Plaintiffs into Spanish. Our Office made the requisite changes, and on October 14, 2021, I sent both clean and redlined versions of the agreement to defense counsel. Between yesterday, October 18, 2021, and today, October 19, 2021, Plaintiffs signed the agreement.

At 9:40 a.m. this morning, I sent an e-mail to defense counsel inquiring about the status of the agreement. In response, Mr. Cohen informed me that he could not see the redlined changes in the agreement. Therefore, at approximately 11:30 a.m., I re-sent clean and redlined versions of the agreement to him. At 5:30 p.m., I followed-up with Mr. Cohen. At 5:35 p.m., Mr. Cohen responded, stating that he did not receive the redlined version of the agreement. I then re-sent the clean and redlined versions of the agreement to Mr. Cohen. At 5:50 p.m., Mr. Cohen stated that the redlined portion of the agreement did not appear redlined when he received it. Therefore, I copied and pasted the provisions that I added to the agreement into the body of an e-mail, which I sent to Mr. Cohen at approximately 6:00 p.m. However, I have not heard back from him.

Accordingly, it has become necessary to ask the Court for a brief extension of time to submit the agreement. Towards that end, I respectfully request the Court to grant the Parties a

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short extension of time to submit the agreement, from today, October 19, 2021, to Friday, October 22, 2021.

Plaintiffs thank the Court for its time and consideration of this matter.

Respectfully submitted,

/s

William K. Oates, Esq.

Michael Faillace & Associates, P.C.

Attorneys for Plaintiffs

cc: Stanley D. Cohen, Esq. (via ECF)
Attorney for Defendants

The requested extension (ECF No. 116) is GRANTED. By **October 22, 2021**, the parties shall file their Revised Settlement Agreement and signed Stipulation of Dismissal in accordance with the Court's directives at ECF No. 115.

The Clerk of Court is respectfully directed to close ECF No. 116.

SO ORDERED 10/20/2021


SARAH L. CAVE
United States Magistrate Judge